

**ATTACHMENT B**

**Particular Things to be Seized**

1. All digital and physical records from November 2013 through August 2018 that relate to violations of Title 18, United States Code, Sections 1343 (Fraud by Wire), 1014 (False Statements), 1344 (Bank Fraud), 1956 (Money Laundering), and 371 (Conspiracy to defraud the United States) and including:

- a. Vehicle loan records to include loan applications, records of loan collateral, credit checks, applications and/or credit reports, loan agreements, notes or mortgages, settlement sheets, vehicle contracts, checks issued for loans, loan interest documentation, lien records and loan payment records
- b. Any vehicle sale payment record to include cash receipts, personal and/or certified checks, money orders, pay stubs and wire transfer records
- c. Sales contracts otherwise known as deals or customer contracts, trade-in vehicle records, receipt or records of the down payment (cash, check and/or wire), copy of driver's license and/or social security cards or other forms of customer identification, income records, place of residency records, utility bills, rent records, W-9's, records of payment from the lending institution to the dealership in settlement of purchased vehicle
- d. Mitsubishi Motors dealership incentive program records, "stair step money" records, records of payments from Mitsubishi Motors Corporation to Hoover Mitsubishi and/or to any of its employees

- e. All desktop computers located in the sales office, finance office and general manager's office or any computer located within the Hoover Mitsubishi dealership believed to have been used to facilitate the above mentioned fraud
- f. USB or other external drives, as well as any items capable of storing digital information
- g. Files, documents, emails or electronic communications discussing vehicle loan records, vehicles sales/transactions and supporting loan documentation
- h. Electronic communications to/from prospective lending institutions for financing of vehicle(s)
- i. Electronic communications between Rustin, CW1, Davis and/or Hoover
- j. Pictures and/or photographs of vehicles sold by Hoover Mitsubishi.
- k. Vehicle Ledgers and inventory lists

2. As used above, the terms "records" and "information" include all of the foregoing items of evidence in whatever form and by whatever means they may have been created or stored, including any form of computer or electronic storage.